

**Title:**

Mr

**Forename:**

Mike

**Surname:**

Harding

**Representing:**

Organisation

**Organisation (if applicable):**

UK Petroleum Industry Association (UKPIA)

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**What do you want Ofcom to keep confidential?:**

Keep nothing confidential

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Ofcom should only publish this response after the consultation has ended:**

Yes

**Comments:**

UK Petroleum Industry Association (UKPIA) represents the nine major oil companies in the UK, which refine crude oil and market fuels, lubricants and other products derived from refining processes. Our members are: BP Oil UK Ltd, ConocoPhillips

Ltd, Esso Petroleum Company Ltd, Murco Petroleum Ltd, Petroplus UK, Shell UK Ltd, Chevron Ltd, Total UK Ltd and INEOS Refining. UKPIA members between them supply about 33% of the energy and manufacture 90% of the petroleum products used in the UK, providing employment for over 120,000 people, many working in the crude oil refineries and storage terminals.

**Question 1: Is there information that we are planning to release that would be covered under one of these exceptions and if so what is the supporting evidence?:**

UKPIA would consider that publication of radio frequencies used by our members, specifically those associated with refinery and terminal operations, may lead to breaches of stringent security measures for the storage of dangerous goods and allow 3rd party interference during possible emergency situations. Oil refineries and some major terminals are considered to be part of the UK Critical National Infrastructure and any threat to their operations should be avoided wherever possible. UKPIA members would welcome the opportunity to discuss further which of their operational frequencies could be made freely available.

**Question 2: Is there information that we are planning to release that would not be in the public interest to do so looking at each exception individually and then in aggregate and if so what is the supporting evidence?:**

**Question 3: We would welcome comments and views on the information we already make available, in particular areas where stakeholders believe this could be improved.:**

**Question 4: We are interested in the views of stakeholders on what information in addition to that contained in Annex 8 they think would help to ensure optimal use of the electro-magnetic spectrum, and on the impact the disclosure of this information might have on licence holders.:**

**Question 5: We are interested in views regarding the areas where we should look towards focusing future research and studies on, and the benefits this will bring to industry, citizens and consumer? What information could we provide to encourage innovation and research?:**

**Question 6: Would stakeholders find information on the price paid for a traded spectrum licence useful and believe that we should make the provision of this mandatory? :**

**Question 7: If yes, what would be the most appropriate way for us to collect these data, for example asking for the specific value, using a check-box system? In what format should information be provided, for example displayed in aggregate format?:**

**Question 8: Do you have any views about the regulatory burden that this would place on the parties involved in a trade, for example would the cost of providing information be prohibitive? Do you have any concerns about the confidentiality of this data?:**

**Question 9: We are interested in comments on whether the publication of spectrum usage data would be beneficial to stakeholders, what should be included and what format this should take.:**

**Question 10: We would welcome any further views on whether there are other areas of non-price information that could be published to the benefit of citizens or consumers.:**

**Question 11: We would welcome any further views on whether there are other areas of non-price information that could be published to the benefit of citizens or consumers.:**